

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 20-33948 (MI)
)
) (Jointly Administered)
)

**NOTICE OF CONTINUATION AND PERFECTION OF LIENS AND PRIVILEGES IN
CERTAIN PROPERTY OF THE DEBTORS' ESTATES
PURSUANT TO 11 U.S.C. § 546(b)**

Atlantic Maritime Services LLC ("Atlantic") provides written notice pursuant to 11 U.S.C. § 546(b) of the continuation and perfection of interests in certain property of the estates of the Debtors Fieldwood Energy, LLC, *et al.* (together, the "Debtors"), and in the proceeds, products, offspring, rents, or profits of such property, and in support thereof, states:

1. Prior to the filing of voluntary chapter 11 petitions by the Debtors on August 3, 2020 and August 4, 2020 (the "Petition Date"), Atlantic provided rental equipment, goods, and associated services to the Debtors in support of the Debtors' digging, drilling, torpedoing, operating, completing, maintaining, and/or repairing of oil and/or gas wells in connection with the oil and gas leases listed below (collectively, the "Oil & Gas Properties");

a. VIOSCA KNOLL-962

Lease #: OCS-G-15445
Area/Block: VK-926

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Parish: ST.TAMMANY/ORLEANS/
PLAQUEMINES/ST. BERNARD

b. **GREEN CANYON-40**

Lease #: OCS-G-34536
Area/Block: GC-40
Parish: LAFOURCHE/PLAQUEMINES/JEFFERSON/
TERREBONNE

c. **MISSISSIPPI CANYON-519**

Lease#: OCS-G-27278
Area/Block: MC-519
Parish: ST.TAMMANY/ORLEANS/
PLAQUEMINES/ST. BERNARD

d. **MISSISSIPPI CANYON-948**

Lease#: OCS-G-28030
Area/Block: MC-948
Parish: ST.TAMMANY/ORLEANS/
PLAQUEMINES/ST. BERNARD

e. **VIOSCA KNOLL-826**

Lease#: OCS-G-06888
Area/Block: VK-826
Parish: ST.TAMMANY/ORLEANS/
PLAQUEMINES/ST. BERNARD

2. Pursuant to the Louisiana Oil Well Lien Act, La. R.S. § 9:4861, *et seq.* and prior to the Petition Date, Atlantic timely preserved and perfected its liens and privileges over each of the Oil & Gas Properties, including but not limited to, the wells, buildings, pipelines, constructions, and other facilities thereon, by filing the lien affidavits attached hereto and identified below (collectively, the “Atlantic Lien Affidavits”)²:

²Atlantic previously provided complete copies of all of the Atlantic Lien Affidavits via formal letter correspondence to the Debtors in accordance with LOWLA.

a. **VIOSCA KNOLL-962:**

- i. Recorded in St. Tammany Parish, State of Louisiana (07/09/2020): Instrument# 2214151, Reg.# 2703762. Attached hereto as **Exhibit 1**.
- ii. Recorded in Orleans Parish, State of Louisiana (07/09/2020): Instrument# 2020-24108, MIN# 1334527. Attached hereto as **Exhibit 2**.
- iii. Recorded in St. Bernard Parish, State of Louisiana (07/09/2020): File# 633137, Book 1944, Folio 347. Attached hereto as **Exhibit 3**.
- iv. Recorded in Plaquemines Parish, State of Louisiana (07/09/2020): File# 2020-00002381, Book 771, Folio 623. Attached hereto as **Exhibit 4**.

b. **MISSISSIPPI CANYON-519:**

- i. Recorded in St. Tammany Parish, State of Louisiana (07/16/2020): Instrument# 2215414, Reg.# 2705272. Attached hereto as **Exhibit 5**.
- ii. Recorded in Orleans Parish, State of Louisiana (07/16/2020): Instrument# 2020-24964, MIN# 1334981. Attached hereto as **Exhibit 6**.
- iii. Recorded in St. Bernard Parish, State of Louisiana (07/16/2020): File# 633341, Book 1945, Folio 419. Attached hereto as **Exhibit 7**.
- iv. Recorded in Plaquemines Parish, State of Louisiana (07/16/2020): File# 2020-00002806, Book 771, Folio 633. Attached hereto as **Exhibit 8**.
- v. Recorded in St. Bernard Parish, State of Louisiana (07/23/2020): File# 633559, Book 1946, Folio 297. Attached hereto as **Exhibit 9**.
- vi. Recorded in Plaquemines Parish, State of Louisiana (07/23/2020): File# 2020-00002926, Book 773, Folio 126. Attached hereto as **Exhibit 10**.

c. **GREEN CANYON-40:**

- i. Recorded in Plaquemines Parish, State of Louisiana (07/16/2020): File# 2020-00002808, Book 772, Folio 683. Attached hereto as **Exhibit 11**.
- ii. Recorded in Jefferson Parish, State of Louisiana (07.16.2020): Instr.# 12032371, Book 4886, Folio 226. Attached hereto as **Exhibit 12**.

- iii. Recorded in Lafourche Parish, State of Louisiana (07.16.2020): Instr.# 1298859, Book 2056, Folio 519. Attached hereto as **Exhibit 13**.
- iv. Recorded in Terrebonne Parish, State of Louisiana (07.16.2020): File# 1606305, Book 3165, Folio 405. Attached hereto as **Exhibit 14**.
- v. Recorded in Plaquemines Parish, State of Louisiana (07/23/2020): File# 2020-00002925, Book 773, Folio 76. Attached hereto as **Exhibit 15**.
- vi. Recorded in Jefferson Parish, State of Louisiana (07/23/2020): Instr.# 12033590, Book 4887, Folio 125. Attached hereto as **Exhibit 16**.
- vii. Recorded in Lafourche Parish, State of Louisiana (07/23/2020): Instr.# 1299324, Book 2058, Folio 411. Attached hereto as **Exhibit 17**.
- viii. Recorded in Terrebonne Parish, State of Louisiana (07/23/2020): File# 1606885, Book 3167, Folio 464. Attached hereto as **Exhibit 18**.

d. MISSISSIPPI CANYON-948:

- i. Recorded in St. Tammany Parish, State of Louisiana (07/16/2020): Instrument# 2215417, Reg.# 2705279. Attached hereto as **Exhibit 19**.
- ii. Recorded in Orleans Parish, State of Louisiana (07/16/2020): Instrument# 2020-24965, MIN# 1334982. Attached hereto as **Exhibit 20**.
- iii. Recorded in St. Bernard Parish, State of Louisiana (07/16/2020): File# 633342, Book 1954, Folio 454. Attached hereto as **Exhibit 21**.
- iv. Recorded in Plaquemines Parish, State of Louisiana (07/16/2020): File# 2020-00002805, Book 772, Folio 616. Attached hereto as **Exhibit 22**.

e. VIOSCA KNOLL-826:

- i. Recorded in St. Tammany Parish, State of Louisiana (07/16/2020): Instrument# 2215418, Reg.# 2705283. Attached hereto as **Exhibit 23**.
- ii. Recorded in Orleans Parish, State of Louisiana (07.16.2020): Instrument# 2020-24966, MIN# 1334983. Attached hereto as **Exhibit 24**.
- iii. Recorded in St. Bernard Parish, State of Louisiana (07.16.2020): File# 2020-00002807, Book 772, Folio 471. Attached hereto as **Exhibit 25**.
- iv. Recorded in Plaquemines Parish, State of Louisiana (07.16.2020): File# 2020-00002807, Book 772, Folio 668. Attached hereto as **Exhibit 26**.

3. In accordance with 11 U.S.C. § 546(b), Atlantic hereby perfects, maintains or continues the perfection of and provides notice of its intention to enforce its liens and privileges in the Oil & Gas Properties (the “Atlantic Liens and Privileges”), which also includes such other property described in the Atlantic Lien Affidavits and set forth in La. R.S. § 9:4861(12)(c) (collectively with the Atlantic Liens and Privileges, the “Encumbered Properties”), and provides notice of its intention to enforce such liens and privileges with respect to such Encumbered Properties. The Atlantic Liens and Privileges perfected, maintained, and/or continued by this Notice extend in and to the proceeds, products, offspring, rents, or profits of such Encumbered Properties.

4. Atlantic further provides notice that it objects to and does not consent to: (a) any effort to prime the Atlantic Liens and Privileges against the Encumbered Properties or any other property of Debtors’ estates; and (b) any use of cash collateral that is the proceeds of hydrocarbons produced from the Encumbered Properties.

5. Atlantic reserves the right to request relief from the automatic stay of 11 U.S.C. § 362, or any other appropriate relief, to enforce and defend the perfected Atlantic Liens and Privileges against the Encumbered Properties.

6. This Notice shall not be deemed an admission that any filing is necessary to perfect or maintain perfection of the Atlantic Liens and Privileges under the Bankruptcy Code, the Louisiana Revised Statutes, or any other applicable law.

7. Atlantic reserves the right to supplement or amend this Notice, including the amounts owed and to itemize any further attorneys’ fees, costs, interest, or other amounts recoverable under applicable law.

8. Atlantic files this Notice without limitation or waiver of any rights, claims, and defenses against Debtors, their bankruptcy estates, and any third parties.

Respectfully submitted,

Houston, Texas
November 23, 2020

/s/ Matthew D. Cavanaugh

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a true and correct copy of the above and foregoing *Notice of Continuation and Perfection of Liens and Privileges in Certain Property of the Debtors' Estates Pursuant to 11 U.S.C § 546(b)* via Notice of Electronic Filing on this 23rd day of November 2020.

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh